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**Attorneys for Defendant
NEW AMERICAN FUNDING**

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Mary E. Daniels,

Plaintiff,

V.

Equifax Information Services, LLC; Ally Financial Inc.; Broker Solutions Inc. DBA New American Funding; National Consumer Telecom & Utilities Exchange, Inc; and Verizon Communications Inc..

Defendants.

CASE NO.: 2:21-cv-00337-JAD-EJY
DEPT. NO.:

**STIPULATION TO EXTEND TIME TO
RESPOND TO THE COMPLAINT**

The parties, by and through their respective counsel of record, hereby stipulate to extend the time for Defendant Broker Solutions, Inc., dba New American Funding (hereinafter “NAF”), to respond to Plaintiff’s Complaint filed on February 26, 2021 (Doc. No. 1.) NAF was served with process on March 1, 2021 and its time to respond is currently March 22, 2021. The parties agree to extend the deadline until April 12, 2021. This is the first stipulation for extension to respond and is

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1 entered into for purposes of engaging in good faith negotiations regarding potential resolution. This
2 request is not for any improper purpose or delay.

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4 DATED: March 19, 2021

WOLFE & WYMAN LLP

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6 By: /s/ Andrew A. Bao
7 ANDREW A. BAO, ESQ.
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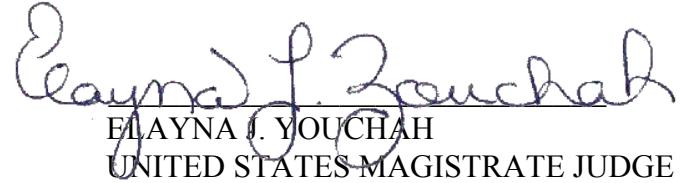
13 DATED: March 19, 2021

KIND LAW

14 By: /s/ Michael Kind
15 MICHAEL KIND, ESQ.
16 Nevada State Bar No: 13903
17 8860 South Maryland Parkway, Suite 106
18 Las Vegas, NV 89123
19 Attorneys for Plaintiff
20 **MARY E. DANIELS**

21 **IT IS SO ORDERED.**

22 DATED this 19th day of March, 2021.

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25 ELAYNA J. YOUCAH
26 UNITED STATES MAGISTRATE JUDGE
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